

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

BROCK FREDIN,

Plaintiff,

--against--

LINDSEY MIDDLECAMP,

Defendant.

Case No. **0:17-cv-03058-SRN-HB**

DECLARATION OF BROCK FREDIN

STATE OF WISCONSIN }
 ss:
COUNTY OF SAINT CROIX }

BROCK FREDIN, being duly sworn, deposes and says:

AUTHENTICATION OF DOCUMENTS

1. Attached hereto as **Exhibit A** is a true and correct copy of an email between Brock Fredin and Karl Johann Breyer containing a link to Dropbox.com discovery folder structures dated November 15, 2019.
2. Attached hereto as **Exhibit B** is a true and correct copy of a lost or destroyed document dated November 15, 2019.
3. Attached hereto as **Exhibit C** is a true and correct copy *Fredin v. Middlecamp*, Case No. 17-CV-3058 Plaintiff's responsive interrogatories containing document productions locations dated November 15, 2019.

4. Attached hereto as **Exhibit D** is a true and correct copy *Fredin v. Miller*, Case No. 18-CV-466 Plaintiff's responsive interrogatories containing document productions locations dated November 15, 2019.

5. Attached hereto as **Exhibit E** is a true and correct copy of emails between Lindsey Middlecamp and Mary Ellen Heng and Tara Patet dated January 24, 2017.

6. Attached hereto as **Exhibit F** is a true and correct copy of continued emails between Lindsey Middlecamp and Mary Ellen Heng and Tara Patet and David McCabe and Laura Pietan dated January 24, 2017 through December 14, 2017.

7. Attached hereto as **Exhibit G** is a true and correct copy of subpoena results for Lindseymiddlecamp.com dated October 16, 2017.

8. Attached hereto as **Exhibit H** is a true and correct copy of emails containing a freedom of information act production from the Minneapolis City Attorney's Office dated October 28, 2019.

Dated: February 10, 2020
Hudson, WI



s/ Brock Fredin
Brock Fredin
Hudson, WI
(612) 424-5512 (tel.)
brockfredinlegal@icloud.com
Plaintiff, Pro Se

A

brock fredin 

Sent - iCloud November 15, 2019 at 8:02 PM

BF

Fredin v. Middlecamp/Miller, Case No. 19-CV-3058 / 18-CV-466

To: Breyer, K. Jon, Ballinger, Adam C.

Please see attached. <https://www.dropbox.com/sh/pl61or> 

3058.pdf



466.pdf

Dropbox > Discovery > November 15, 2019 Discovery








Overview

Hide
















Click here to describe this folder and turn it into a Space

Show examples

Create new file ▾

<input type="checkbox"/> Name ↑	Modified ▾	Members ▾	⋮ ▾
 466	--	Only you	...
 3058	--	Only you	...
 lost-destroyed.docx	11/15/2019 6:00 pm	Only you	...
 lost-destroyed.pdf	11/15/2019 6:00 pm	Only you	...
 Newly Found Following Deposition	--	Only you	...














Name ↑	Modified ↓	Members ↓	
 6	--	Only you	...
 7	--	Only you	...
<input type="checkbox"/>  8 ☆	--	Only you	<div>Share ▼</div> <div>...</div>
 9	--	Only you	...
 10	--	Only you	...
 11	--	Only you	...
 12	--	Only you	...
 13	--	Only you	...
 14	--	Only you	...
 15	--	Only you	...
 16	--	Only you	...
 17	--	Only you	...
 18	--	Only you	...
 19	--	Only you	...
 466.docx	11/16/2019 12:12 pm	Only you	...

Overview

Hide

Click here to describe this folder and turn it into a Space Show examples

Create new file ▾

Name ↑	Modified ▾	Members ▾	⋮ ▾
 interrogatory 15	--	Only you	⋮
 Interrogatory 1	--	Only you	⋮
 Interrogatory 2	--	Only you	⋮
 Interrogatory 4	--	Only you	⋮
 Interrogatory 5	--	Only you	⋮
<input type="checkbox"/>  Interrogatory 3 ☆	--	Only you	Share ▾ ⋮
 interrogatory 6	--	Only you	⋮
 interrogatory 7	--	Only you	⋮
 interrogatory 8	--	Only you	⋮
 interrogatory 9	--	Only you	⋮
 interrogatory 10	--	Only you	⋮

Name ↑	Modified ▾	Members ▾	⋮ ▾
<input type="checkbox"/> 1	--	Only you	
<input type="checkbox"/> 2	--	Only you	
<input type="checkbox"/> 3	--	Only you	
<input type="checkbox"/> 4 ★	--	Only you	
<input type="checkbox"/> 5 ★	--	Only you	<div>Share ▾</div> <div>🔗</div>
<input type="checkbox"/> 6	--	Only you	
<input type="checkbox"/> 7	--	Only you	
<input type="checkbox"/> 8	--	Only you	
<input type="checkbox"/> 9	--	Only you	
<input type="checkbox"/> 10	--	Only you	
<input type="checkbox"/> 11	--	Only you	
<input type="checkbox"/> 12	--	Only you	
<input checked="" type="checkbox"/> 13	--	Only you	<div>Share ▾</div> <div>🔗</div>














Overview

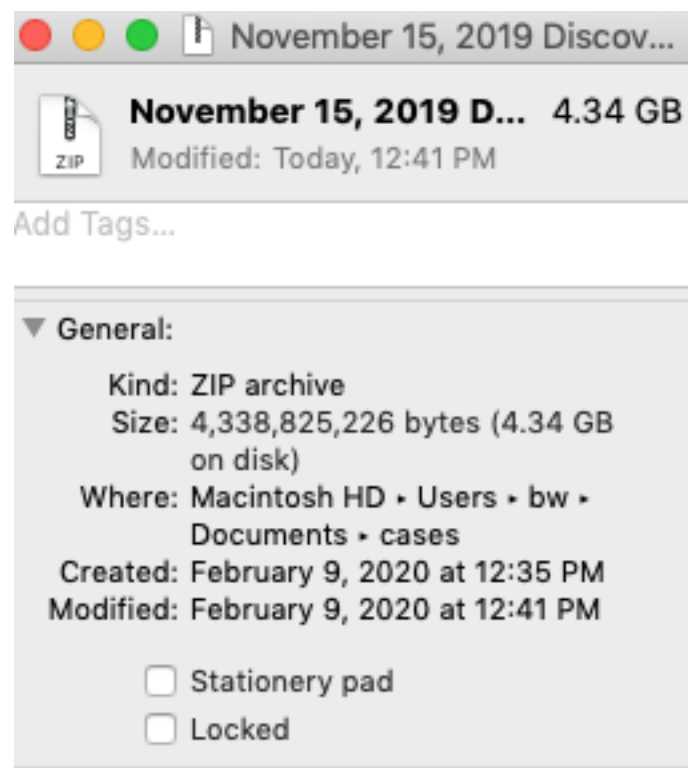
Hide

[Click here to describe this folder and turn it into a Space](#)

Show examples

Create new file ▾

Name ↑	Modified ▾	Members ▾	⋮ ▾
 Interrogatory 2	--	Only you	⋮
 interrogatory 3	--	Only you	⋮
 interrogatory 4 ☆	--	Only you	<div>Share ▾ ⋮</div>
 interrogatory 5	--	Only you	⋮
 interrogatory 6	--	Only you	⋮
 interrogatory 7	--	Only you	⋮
 interrogatory 9	--	Only you	⋮
 interrogatory 12	--	Only you	⋮
 interrogatory 13	--	Only you	⋮
 interrogatory 14	--	Only you	⋮
 interrogatory 17	--	Only you	⋮



B

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

BROCK FREDIN,

Case No. 17-CV-3058

Plaintiff,

--against--

LINDSEY MIDDLECAMP

Defendants.

BROCK FREDIN,

Case No. 18-CV-466

Plaintiff,

--against--

GRACE MILLER,
CATHERINE SCHAEFER

Defendants.

LOST OR DESTROYED DOCUMENTS

1. Text Messages
 - a. Text messages e.g., messages to my mother Kathleen Fredin and brother
 - b. January 2014 to present
 - c. May 2017
 - d. The Saint Paul Police took all of my devices and the items were never turned on again before being deleted, sold, and/or wiped clean
 - e. Swat raid
 - f. David McCabe, Brock Fredin
 - g. Brock Fredin, David McCabe
 - h. Brock Fredin, David McCabe
2. Emails
 - a. Emails e.g., emails between Grace Miller
 - b. July 2016 to February 2017

- c. May 2017
 - d. The Saint Paul Police took all of my devices and the items were never turned on again before being deleted, sold, and/or wiped clean
 - e. Swat raid
 - f. David McCabe, Brock Fredin
 - g. Brock Fredin, David McCabe
 - h. Brock Fredin, David McCabe
3. Dating Profiles
- a. Dating Profiles e.g., YouAreAmazing, PaperTreadMill, GopherBadge
 - b. January 2014 to present
 - c. May 2017
 - d. The Saint Paul Police took all of my devices and the items were never turned on again before being deleted, sold, and/or wiped clean
 - e. Swat raid
 - f. David McCabe, Brock Fredin
 - g. Brock Fredin, David McCabe
 - h. Brock Fredin, David McCabe
4. Others e.g., forgot or regularly wiped material
- a. Text messages, court documents
 - b. January 2014 to present
 - c. Unknown
 - d. Not accessible with reasonable diligent search
 - e. Unknown but discovery is ongoing and will do routine searches
 - f. Brock Fredin
 - g. Brock Fredin
 - h. Brock Fredin

C

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

BROCK FREDIN,

Plaintiff,

--against--

LINDSEY MIDDLECAMP,

Defendant.

Case No. 17-CV-3058

PLAINTIFF BROCK FREDIN'S GENERAL OBJECTIONS

Any response to these interrogatories is made in the interest of fairness and openness and does not waive this or any other General Objection. Given the negative press coverage elicited by the Defendant in this case, the Plaintiff has suffered immense harm to his career. This raises a question as to the intent of this civil inquiry and motivation behind these questions and if the Defendant is using this proceeding as a means to advance the Defendants further harassment of Plaintiff or drain him of precious financial resources and Plaintiff raises general objections on the whole. Specifically, Plaintiff objects to each and every question put forth as violative of Fed. R. Civ. P. 26.02(b)(3) ("Unless otherwise limited by court order, the scope of discovery is as follows: Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.

Information within this scope of discovery need not be admissible in evidence to be discoverable.”). Plaintiff states that discovery is ongoing and reserves the right to supplement and amend answers below. The above-stated objections are made applicable to each and every question and are incorporated by reference in every Answer as if fully set forth therein.

Even more important, Defendant is a public official employed as a Special Assistant United States Attorney for the United States District Court of Minnesota. On the side, she admittedly operates the vile @CardsAgstHrsmt Twitter account anonymously in which she posts information at least derived in part from her position as a federal official. Private citizens have a right to criticize public officials engaging in misconduct. *See Wilbur v. Mahan*, 3 F.3d 214, 216 (7th Cir. 1993) (“The right to criticize public officials is at the heart of the First Amendment’s right of free speech.”); *State v. Montag*, 2012 WL 4052714, at *3 (Minn. Sept. 17, 2012) (“A citizen’s right to criticize public officials is an essential protection provided by the First Amendment.”); *Lydiard v. Wingate*, 131 Minn. 355, 356 (Minn. 1915) (“The interest which every citizen has in good government requires that the right be not unduly curtailed to express his opinion upon public officials ... to seek and convey information concerning their plans and purposes, and to freely criticize proposed methods and measures.”).

INTERROGATORIES

INTERROGATORY NO. 1: Identify all women you have raped or sexual violated.

ANSWER: Well, 0, because I am gay.

INTERROGATORY NO. 2: Identify all physical manifestations of your emotional distress as alleged in paragraph 2 of the Amended Complaint.

ANSWER:

Extreme Sleep Disturbance

Weight Fluctuations

Previously unknown anger/frustration issues that never occurred prior to Defendants actions

Difficulty managing frustrations

Chronic checking of doors, windows, and jumping at loud noises for fear of another swat raid

Anxiety attacks

Chronic fatigue

Shunning all social activity

Diminished/destroyed sexual drive

Mood swings

Unexplained physical pain

INTERROGATORY NO. 3: Identify all medical professional with whom you have consulted regarding your emotional distress.

ANSWER:

Location: Folder 9 > Interrogatory 3

Given your clients outrageous actions, I have been unable to secure health insurance.

I have only been able to seek free public health care through Saint Croix County

Wisconsin Public Health.

Depression and Anxiety diagnosis with David Hitch, Saint Croix County, WI

Health Therapist, and same facility staff psychiatrist prescriptions of Effexor for

Depression/Anxiety.

Visits to Nicole Eizenger, Park Nicollet Nurse Practitioner, Effexor prescription, Saint

Louis Park, MN

INTERROGATORY NO. 4: Identify with specificity all “defamatory statements” made by Defendant as alleged in paragraph 3 of the Amended Complaint. Include date, time, location, medium, online location, and the exact words you contend are defamatory.

ANSWER:

Location: Folder 9 > Interrogatory 4

<https://www.dropbox.com/s/allxpdxu4an8ul/twitter.pdf?dl=0>

February 22, 2017, Time unknown, @CardsAgstHrsmt Tweet:

The power of sharing. Within hours of the stalking post going up, a rape survivor comes forward. He remains free. (Shared w/ her permission)

INTERROGATORY NO. 5: Identify all facts and documents that support the contention that Defendant commenced a baseless HRO proceeding as alleged in paragraph 8 of the Amended Complaint.

ANSWER:

Location: Folder 9 > Interrogatory 1-17, 5

- September 2017 Settlement Attempt indicating Abuse of Process
- Subpoena for Lindsey Middlecamp.com indicating Another User Registered the Website
- October 28, 2019 FOIA Request Indicating the January 24, 2017 email between Lindsey Middlecamp and Mary Ellen Heng, Tara Patet, David McCabe
- Catherine Schaefer's false police reports indicating extrajudicial relationships between Mary Ellen Heng and Referee Elizabeth Clysdale

INTERROGATORY NO. 6: Identify with specificity all lost employment opportunities as alleged in paragraph 9 of the Amended Complaint.

ANSWER:

Offers Declined / Rescinded Based on Defendants Defamation:

Job: Patterson, Mendota Heights, MN, 2016

Job: Intertech / Logistics Health, La Crosse WI, July 2017

Job: DevJam / Trane, La Crosse, WI, January and February 2017

Job: Royal Bank of Canada (RBC), Minneapolis, MN, June 2017

Job: Mayo Clinic, Rochester, MN, September 2017

Discover Credit Card, Chicago IL, August 2019

TapQA / Infinity Car Insurance, Birmingham, AL, February 2018

State of MN / Hennepin County, September 2018

Nike, Portland, Oregon, July 2018

Mortgage Cadance / Accenture, Minneapolis MN, April 2017

Best Buy, Richfield, MN, March 2017

Leidos, Mendota Heights, MN, March 2017

Lifetouch, Eden Prairie, MN, March 2017

FPX, Bloomington, MN, January 2017

Job Applications:

Upon information and belief, entered around 2,000 job applications with no job offers or ability to work from January 2017 – present.

INTERROGATORY NO. 7: Identify all addresses where you have resided from 2016 to present, indicating the dates in which you have lived at those locations.

ANSWER:

- **Location: Folder 9 (Interrogatory 7 folder > 1905 iris bay)**
- **Nature of Document: PDF**
- **Date: January 1, 2017**
- **Subject Matter: 2017 Income Taxes**
- **Individual: Brock Fredin**
- **Address: 1905 iris Bay, Hudson, WI 54016**

- **Location: Folder 9 (Interrogatory 7 folder > 1905 iris bay)**
- **Nature of Document: PDF**

- **Date: April 28, 2017**
- **Subject Matter: Search Warrant**
- **Individual: Brock Fredin, David McCabe, et al**
- **Address: 1905 Iris Bay, Hudson, WI 54016**

1180 Grand Ave, Saint Paul, MN October 2015 – September/October 2016

1905 Iris Bay Hudson, WI 54016, September/October 2016 – July/August 2017.

1180 7th Ave, Baldwin, WI, July/August 2017 – Present/August 2019

- Walmart, 801 Meacham Rd, Elk Grove Village, IL 60007 (June/July 2019) (while interviewing for jobs at Mastercard and other positions.)
- Planet Fitness, N89W16899 Appleton Ave, Menomonee Falls, WI 53051 (Given Defendants action had only \$20 after gas money depleted and used it on membership to shower and sleep in parking lot off and on), August 2019 to October 1, 2019
- Walmart, Germantown, WI 190n9855 Appleton Ave, Germantown, WI 53022, August 2019 to Present (off and on while working for a fortune 500 company)
- Motel 6, Glendale WI, 485 N Port Washington Rd, Glendale, WI October 1, 2019 to November 2019 (off and on while working for a fortune 500 company)
- Motel 6 Elk Grove, IL, 2881 Touhy Ave, Elk Grove Village, IL 60007, October 4, 2019 to November 2019 (off and on while working for a fortune 500 company and interviewing for positions at Mastercard/etc)

November 12, 2019 – present, Redacted Phoenix, Arizona Address. The address changes per work requirements. I am terrified of these powerful women who have ruined my life and fearful they will direct either vigilante or state-sponsored physical violence on me wherever I go, or worse, destroy my professional reputation with companies in this location. I will object to any more specific address identification than what is provided to fulfill the requirement of the interrogatory and the Court's order unless it's carried out for in camera review, sealed, or redacted.

INTERROGATORY NO. 8: Identify by description and amount each item of damages that you are claiming for each count in the Amended Complaint, set forth in detail the complete factual basis and calculation for each item of damages, and identify all documents that

support or relate to the alleged damages.

ANSWER: Each amount to be determined at jury trial.

INTERROGATORY NO. 9: Identify each person known to you who has or claims to have knowledge of any facts relevant to the issues in this lawsuit, stating in detail all facts each person knows or claims to know.

ANSWER:

Lindsey Middlecamp

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Emails to Mary Ellen Heng
- Emails to Tara Patet
- Emails to David McCabe
- Conversation with Grace Miller
- Conversations with Catherine Schaefer

James Street, Patrick C. Diamond, Elizabeth Clysdale, Sophia Y. Vuelo, Adam Yang

- Presiding over various hearings, communication with other judges e.g., guthman, and each other
- Clysdale's communication with Mary Ellen Heng or Tara Patet

Mary Ellen Heng

- Communication with Lindsey Middlecamp
- April 28, 2017 raid
- April 14, 2017 HRO

Tara Patet

- Communication with Lindsey Middlecamp
- April 28, 2017 raid

- April 14, 2017 HRO
- Charging Decisions

Yamy Vang

- Communication with Lindsey Middlecamp
- Communicaiton with Sophia Y. Vuelo
- April 28, 2017 raid
- April 14, 2017 HRO
- Charging Decisions

Catherine Schaefer

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Emails to Mary Ellen Heng
- Emails to Tara Patet
- Emails to David McCabe
- Conversation with Grace Miller
- Conversation with Lindsey Middlecamp

Grace Miller

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Emails to Mary Ellen Heng
- Emails to Tara Patet
- Emails to David McCabe
- Conversation with Lindsey Middlecamp
- Conversation with Catherine Schaefer

Emma Miller

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Conversation with Lindsey Middlecamp
- Conversation with Catherine Schaefer
- Conversation with Grace Miller

Tony Webster

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Conversation with Lindsey Middlecamp
- Conversation with David Middlecamp
- Conversation with Catherine Schaefer
- Conversation with Grace Miller

David Middlecamp

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Conversation with Lindsey Middlecamp
- Conversaion with Tony Webster
- Conversation with Catherine Schaefer
- Conversation with Grace Miller

Joshua Post Lee

- Communicaion with Catheirne Schaefer

David McCabe, Amy Boyer

- April 28, 2017 raid
- Various False Police Reports

- False Rape Claim

Jon Gould, Derek Bickle, Jeff Gaylord, Ryan Fredin (brother), Kathleen Fredin (mother), Faith Amdahl (sister), Sarah Logghe

- Non-party family and friends with knowledge of the situation.

INTERROGATORY NO. 10: Identify each person you expect to call, or you may call, as an expert witness at trial and, with respect to each person identified, set forth specifically, completely and in detail:

- a. The name, address and qualifications of the expert, including without limitation the expert's educational, academic, professional and vocational background.
- b. Identify any published articles or treatises authored by the expert witness relevant to the subject of the inquiry in this matter. Such identification should include the title of the article, the publication in which it appeared, and the date of publication.
- c. Provide the venue and case title of any other litigation in which the expert witness has been retained.
- d. State the substance of the facts to which the expert is expected to testify about and which the expert has personal knowledge.
- e. State the substance of the facts, the truth of which the expert has been or will be asked to assume.
- f. State the substance of all the opinions to which the expert is expected to testify.
- g. State in summary, the grounds for each such opinion identifying any publications upon which the expert has relied in whole or in part grounding the opinions held, any data or other information considered by the expert in forming the opinion, and any exhibits to be used as a summary of or support for the opinion.

ANSWER: Unknown

INTERROGATORY NO. 11: Identify each individual you intend to present as a witness at trial. Include in your answer the name, address and telephone number of each witness identified and a brief description of the subject matter of their anticipated testimony.

ANSWER: Unknown

INTERROGATORY NO. 12: Identify each document or exhibit in your possession which is relevant to the issues in this action, or which you may use, offer, or introduce with respect to motion practice or at the trial in the above-entitled matter.

ANSWER:

<https://www.dropbox.com/s/al1xpdxxu4an8ul/twitter.pdf?dl=0>

April 14, 2017 HRO Petition

October 3, 2017 final HRO Petition

July 2017 Transcripts from Susan Segal admitting her contacts to law enforcement in what became service of the April 14, 2017 petition

July 2017 transcript/statements by Defendant admitting to speaking to David McCabe prior to the raid

April 26, 2017 Search Warrant Affidavit

April 27, 2017 Saint Paul Police Report Admission by David McCabe

Private investigations finding no police reports or allegations filed in Saint Louis Park, Minneapolis, or elsewhere referencing a false rape. Same investigation referencing a lack of probable cause or any criminal process as it relates to a false

rape allegation.

INTERROGATORY NO. 13: Identify all statements taken or received relating to the matters/issues identified in the pleadings and for each such statement:

- a. Identify each person from whom you have taken the statement;
- b. Identify whether the statement was oral, written, by a court reporter, or video
- c. Identify each person taking the statement and any other person present during the statement

ANSWER:

1. Kathleen Fredin
 - a. Kathleen Fredin
 - b. Oral, written
 - c. Kathleen Fredin and Brock Fredin and spoke
2. *Middlecamp v. Fredin* Hearings
 - a. Susan Segal
 - b. Written, Court Reporter, and Oral
 - c. Brock Fredin cross examined Susan Segal
3. *Middlecamp v. Fredin* Hearings
 - a. Lindsey Middlecamp
 - b. Written, Court Reporter, and Oral
 - c. Brock Fredin cross examined Lindsey Middlecamp
4. *April 28, 2017 raid, State v. Fredin, 62-CR-17-3156*
 - a. David McCabe
 - b. Written, Court Reporter, and Oral
 - c. Brock spoke with David McCabe on April 28, 2017 and prior to that about Lindsey Middlecamp's antics, Christina Zauhar cross examined David McCabe
5. *April 28, 2017 raid, State v. Fredin, 62-CR-17-3156*

- a. David McCabe
 - b. Written, Court Reporter, and Oral
 - c. Brock spoke with David McCabe on April 28, 2017 and prior to that about Lindsey Middlecamp's antics, Christina Zauhar cross examined David McCabe
6. *Amy Boyer, April 28, 2017 raid*
 - a. Amy Boyer
 - b. Written, Court Reporter, and Oral
 - c. Brock spoke with Amy Boyer
7. *Nqua Yang*
 - a. Nqua Yang
 - b. Written, Court Reporter, and Oral
 - c. Brock spoke with Yang, he also testified in 62-CR-18-157
8. *David Middlecamp*
 - a. Written, Court Reporter, and Oral
 - b. he also testified in 62-CR-18-157
9. *Schaefer v. Fredin* Hearings
 - a. Catherine Schaefer
 - b. Written, Court Reporter, and Oral
 - c. Brock Fredin cross examined Catherine Schaefer
10. Ryan Fredin
 - a. Ryan Fredin
 - b. Oral, written
 - c. Ryan Fredin and Brock Fredin spoke
11. Ramsey County District Court Records
 - a. Records Department
 - b. Oral, written
 - c. Gathered Documents

INTERROGATORY NO. 14: Identify any oral representations, admissions, or statements against interest allegedly made by Defendant that are relevant to the issues in this lawsuit:

- a. Identify in detail the terms of each admission and indicate the date and place of making each admission;
- b. Identify the name, occupation, title, telephone number, and the last known business and residential address of the person(s) purportedly making each admission and the person(s) purportedly present at the time each admission was made; and
- c. Identify by author, date, title, and subject matter each document that evidences or refers to each admission.

ANSWER:

- A. CardsAgstHrsmt
 - a. Twitter @CardsAgstHrsmt
 - b. Lindsey Middlecamp, Minneapolis Assistant Attorney, Minneapolis, MN
 - c. January 24, 2017 to April 2017, @CardsAgstHrsmt, Twitter.PDF
- B. *City Pages* Reporter Michael Mullen and Hannah Sayle
 - a. January 2017 to February 22, 2017
 - b. Michael Mullen, reporter City Pages, Hannah Sayle, reporter City Pages, Minneapolis, MN
 - c. January 2017, January 24, 2017 email in FOIA request, in Folder 9 > Interrogatory 14
- C. Grace Miller and Catherine Schaefer
 - a. March 2016 - present
 - b. Grace Miller, United States Air Force Major, Saint Paul, MN. Catherine Schaefer, PhD researcher, Penn State, PA

- c. January 24, 2017 Lindsey Middlecamp referred to or acknowledged speaking to Grace Miller and Catherine Schaefer, January 24, 2017 email in FOIA request, in Folder 9 > Interrogatory 14

D. Emma Miller

- a. February 2017
- b. Emma Miller, unknown, Grace Miller's Sister
- c. February 2017 retweet of Lindsey Middlecamp's attacks

E. Mary Ellen Heng

- a. January 24, 2017
- b. Mary Ellen Heng, Deputy Minneapolis Assistant City Attorney, Minneapolis, MN
- c. January 24, 2017 email in FOIA request, in Folder 9 > Interrogatory 14

F. Tara Patet

- a. January 24, 2017
- b. Tara Patet, Saint Paul Assistant City Attorney, Saint Paul, MN
- c. January 24-25, 2017 email in FOIA request, in Folder 9 > Interrogatory 14

G. David McCabe

- a. January 24, 2017, April 14, 2017
- b. David McCabe, Saint Paul Police Officer, Saint Paul, MN
- c. January 24-25, 2017 email in FOIA request, in Folder 9 > Interrogatory 14

H. Emily Mawer

- a. April 14, 2017
- b. Emily Mawer, Dorsey and Whitney lawyer, Minneapolis, MN
- c. April 14, 2017 email in FOIA request, in Folder 9 > Interrogatory 14

I. Minneapolis City Attorney's Office and its staff

- a. April 14, 2017
- b. Minneapolis, MN
- c. April 14, 2017 email in FOIA request, in Folder 9 > Interrogatory 14

- J. David Middlecamp
 - a. Unknown
 - b. Husband to Lindsey Middlecamp, Minneapolis, MN
 - c. Unknown
- K. Tony Webster
 - a. March 2019 - present
 - b. Software developer, Minneapolis, MN
 - c. March 2019, Folder 9 > Interrogatory 14

INTERROGATORY NO. 15: Identify the persons and entities from whom documents were sought and gathered for production in response to Defendant's Request for Production of Documents.

ANSWER: Documents were sought and gathered through Plaintiff's personal email, storage, and records.

INTERROGATORY NO. 16: Identify all persons who provided answers or assisted in providing answers to these interrogatories.

ANSWER: No known entity exists. I would have made far fewer mistakes if I had an attorney.

INTERROGATORY NO. 17: Identify the persons and entities from whom documents were sought and gathered for production in response to Defendant's Request for Production of Documents.

ANSWER: Documents were sought and gathered through Plaintiff's personal email, storage, and records. I also sought documents from state court records e.g., Ramsey County Records.

Dated: September 29, 2017
Milwaukee, WI

/s/ Brock Fredin

Brock Fredin
Baldwin, WI 54016
(612) 424-5512 (tel.)
brockfredinlegal@icloud.com
Plaintiff, Pro Se

D

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

BROCK FREDIN,

Plaintiff,

--against--

GRACE MILLER,
CATHEIRNG SCHAEFER

Defendant.

Case No. 18-CV-466

PLAINTIFF BROCK FREDIN'S GENERAL OBJECTIONS

Any response to these interrogatories is made in the interest of fairness and openness and does not waive this or any other General Objection. Given the negative press coverage elicited by the Defendant in this case, the Plaintiff has suffered immense harm to his career. This raises a question as to the intent of this civil inquiry and motivation behind these questions and if the Defendant is using this proceeding as a means to advance the Defendants further harassment of Plaintiff or drain him of precious financial resources and Plaintiff raises general objections on the whole. Specifically, Plaintiff objects to each and every question put forth as violative of Fed. R. Civ. P. 26.02(b)(3) ("Unless otherwise limited by court order, the scope of discovery is as follows: Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.

Information within this scope of discovery need not be admissible in evidence to be discoverable.”). Plaintiff states that discovery is ongoing and reserves the right to supplement and amend answers below. The above-stated objections are made applicable to each and every question and are incorporated by reference in every Answer as if fully set forth therein.

INTERROGATORIES

INTERROGATORY NO. 1: Identify all online profiles, identities, usernames or other identifiers you have used.

ANSWER:

I do not have record of most profile data. They were cleaned following the April 28, 2017 swat raid.

- Username: _YouAreAmazing (inactive)
- Nature of Document: pdf within answer 13 folder
- Date: January 2014 to January 2016 and/or prepared November 11, 2019
- Subject Matter: Match.com Internet dating profile
- Individual: Brock Fredin registered
- Address: Unknown

- Username: GopherBadge, PaperTreadmill, phone_problems, viewfine, foryoualwaysnow, evenrandom, whereisthefun, portshore, mplsnow (inactive)
- Nature of Document: pdf within answer 13 folder
- Date: January 2014 to January 2016 and/or prepared November 11, 2019
- Subject Matter: OkCupid, Match.com, or POF.com Internet dating profile
- Individual: Brock Fredin registered
- Address: Unknown

- Username: science (inactive), slutville (inactive), slavemarket (inactive)
- Nature of Document: pdf within answer 13 folder
- Date: January 2014 to January 2016 and/or prepared November 11, 2019
- Subject Matter: Fetlife.com Internet dating profile
- Individual: Brock Fredin registered
- Address: Unknown

- Username: epicview (inactive), momentumchaser (inactive)
- Nature of Document: pdf within answer 13 folder

- Date: January 2014 to January 2018 and/or prepared November 11, 2019
- Subject Matter: cs.com Internet dating profile
- Individual: Brock Fredin registered
- Address: Unknown
- Username: gator (inactive)
- Nature of Document: pdf within answer 13 folder
- Date: January 2017 to present and/or prepared November 11, 2019
- Subject Matter: SA.com Internet dating profile
- Individual: Brock Fredin registered
- Address: Unknown
- Username: unknown (inactive)
- Nature of Document: pdf within answer 13 folder
- Date: January 2017 to present and/or prepared November 11, 2019
- Subject Matter: Grindr mobile dating profile
- Individual: Brock Fredin registered
- Address: Unknown
- Username: Felix (inactive)
- Nature of Document: pdf within answer 13 folder
- Date: January 2017 to present and/or prepared November 11, 2019
- Subject Matter: Bumble dating profile
- Individual: Brock Fredin registered
- Address: Unknown
- Username: Brock, William, or Erik (inactive) (I may have used one other alias on Tinder but do not remember and have taken reasonable steps to locate without success)
- Nature of Document: pdf within answer 13 folder
- Date: January 2017 to present and/or prepared November 11, 2019
- Subject Matter: Bumble, Tinder, or Hinge dating profile
- Individual: Brock Fredin registered
- Address: Milwaukee, WI

Usernames that are inactive: GopherBadge, PaperTreadmill, Science, epicview, brockfl2, dan8221, field.gator, brockfredin, phone_problems, evenrandom, slutville, whereisthefun, portshore, mplsnow, foryoualwaysnow, viewfine, _YouAreAmazing, gator, gophernow

INTERROGATORY NO. 2: Identify all facts and documents that support the contention that Schaefer posed as Plaintiff between May and June 2016 as described in the Amended Complaint.

ANSWER:

- Location: Folder 13 (Interrogatory 2 folder > profiles)

- Location: Folder 13 (Interrogatory 2 folder (email.pdf))
 - Nature of Document: emails and profile pdfs within answer 13 folder and throughout requests for production
 - Date: May 31, 2016
 - Subject Matter: Messages from blackoutx2 and epicviewf12
 - Individual: Catherine Schaefer sent the messages and Brock Fredin viewed the messages from blackoutx2 and epicviewf12
 - Address: 1180 Grand Ave, Saint Paul, MN
-
- Location: Folder 13 (Interrogatory 2 folder > Joshua Post Lee)
 - Nature of Document: Facebook messages and Text Messages
 - Date: December 2016
 - Subject Matter: Messages between Joshua Post Lee and Brock Fredin
 - Individual: Joshua Post Lee / Brock Fredin
 - Address: 1905 Iris Bay, Hudson, WI
-
- Location: Folder 13 (Interrogatory 2 folder > Glitterbomb)
 - Nature of Document: Internet Profile
 - Date: December 2016
 - Subject Matter: Catherine Schaefer's Profile
 - Individual: Catherine Schaefer
 - Address: Unknown

INTERROGATORY NO. 3: Specify all incidents in which your personal and professional reputation has been harmed by Defendants as alleged in paragraph 3 of the Amended Complaint and identify all documents that support that allegation.

ANSWER: Contained in documents provided.

Offers Declined / Rescinded Based on Defendants Defamation:

Job: Patterson, Mendota Heights, MN, 2016

Job: Intertech / Logistics Health, La Crosse WI, July 2017

Job: DevJam / Trane, La Crosse, WI, January and February 2017

Job: Royal Bank of Canada (RBC), Minneapolis, MN, June 2017

Job: Mayo Clinic, Rochester, MN, September 2017

Discover Credit Card, Chicago IL, August 2019

TapQA / Infinity Car Insurance, Birmingham, AL, February 2018

State of MN / Hennepin County, September 2018

Nike, Portland, Oregon, July 2018

Mortgage Cadance / Accenture, Minneapolis MN, April 2017

Best Buy, Richfield, MN, March 2017

Leidos, Mendota Heights, MN, March 2017

Lifetouch, Eden Prairie, MN, March 2017

FPX, Bloomington, MN, January 2017

Job Applications:

Upon information and belief, entered around 2,000 job applications with no job offers or ability to work from January 2017 – present.

INTERROGATORY NO. 4: Identify all physical manifestations of your emotional distress as alleged in paragraph 2 of the Amended Complaint. Extreme Sleep Disturbance

- **Location: Folder 13 (Interrogatory 4 folder)**
- **Nature of Document: PDF**
- **Date: December 2016 to present**
- **Subject Matter: Health Partners Appointment List**
- **Individual: Yvonne Eisenger**
- **Address: Saint Louis Park, MN**

ANSWER:

Weight Fluctuations

Previously unknown anger/frustration issues that never occurred prior to Defendants actions

Difficulty managing frustrations

Chronic checking of doors, windows, and jumping at loud noises for fear of another swat raid

Anxiety attacks

Chronic fatigue

Shunning all social activity

Diminished/destroyed sexual drive

Mood swings

Unexplained physical pain

INTERROGATORY NO. 5: Identify all medical professional with whom you have consulted regarding your emotional distress.

ANSWER:

- Location: Folder 13 (Interrogatory 5 folder)
- Nature of Document: PDF
- Date: December 2016 to present
- Subject Matter: Health Partners Appointment List
- Individual: Yvonne Eisenger
- Address: Saint Louis Park, MN

Given your clients outrageous actions, I have been unable to secure health insurance.

I have only been able to seek free public health care through Saint Croix County Wisconsin Public Health.

Depression and Anxiety diagnosis with David Hitch, Saint Croix County, WI Health Therapist, and same facility staff psychiatrist prescriptions of Effexor, Klonopin, and Gabipentin for Depression/Anxiety.

Visits to Nicole Eizenger, Park Nicollet Nurse Practioner, Effexor, Klonopin, and Gabipentin, Saint Louis Park, MN

INTERROGATORY NO. 6: Identify all attempts at seeking employment as described in paragraph 37 of the Amended Complaint and identify all documents evidencing the

prospective employer's response.

ANSWER:

- Location: Folder 13 (Interrogatory 6 folder)
- Nature of Document: PDF
- Date: January 2017 to present
- Subject Matter: Job Submissions, Offers, and Communications
- Individual: Brock Fredin and various companies
- Address: N/A

Contained in documents provided.

Offers Declined / Rescinded Based on Defendants Defamation:

Job: Patterson, Mendota Heights, MN, 2016

Job: Intertech / Logistics Health, La Crosse WI, July 2017

Job: DevJam / Trane, La Crosse, WI, January and February 2017

Job: Royal Bank of Canada (RBC), Minneapolis, MN, June 2017

Job: Mayo Clinic, Rochester, MN, September 2017

Discover Credit Card, Chicago IL, August 2019

TapQA / Infinity Car Insurance, Birmingham, AL, February 2018

State of MN / Hennepin County, September 2018

Nike, Portland, Oregon, July 2018

Mortgage Cadance / Accenture, Minneapolis MN, April 2017

Best Buy, Richfield, MN, March 2017

Leidos, Mendota Heights, MN, March 2017

Lifetouch, Eden Prairie, MN, March 2017

FPX, Bloomington, MN, January 2017

Job Applications:

Upon information and belief, entered around 2,000 job applications with no job offers or ability to work from January 2017 – present.

INTERROGATORY NO. 7: Identify all words and phrases in the City Pages article that you claim were defamatory as alleged in paragraphs 31, 32 and 38 of the Amended Complaint.

ANSWER:

- Location: Folder 13 (Interrogatory 1-7 folder and 8)
- Nature of Document: PDF
- Date: January 2016 to Present
- Subject Matter: City Pages Articles, Revenge Pornography Advertisements, DatingPsychos
- Individual: Michael Muller Concerning Brock Fredin
- Address: N/A

Specifically, Defendants published in an article in the *City Pages* stating that Plaintiff sent “sexually suggestive messages” and contacted two women “dozens of times by unfamiliar numbers and dating profiles” – numbers and messages not connected to Plaintiff Fredin and was contrived by Defendants, stated an unnamed women “coached” the other, and falsely claimed that Plaintiff’s attorney “filed to make Schaefer undergo a deposition”. Moreover, Defendants published the article claiming that Defendant Schaefer “cancelled” the date, Defendants were “victims” or “badass heroines”, etc.

INTERROGATORY NO. 8: Identify with specificity all “defamatory statements” made by Defendant as alleged in paragraph 3 of the Amended Complaint. Include date, time, location, medium, online location, and the exact words you contend are defamatory.

ANSWER:

- Location: Folder 13 (Interrogatory 1-14 folder)
- Nature of Document: PDF
- Date: January 1, 2016 to present
- Subject Matter: City Pages Article, Revenge Porn, False Police Reports
- Individual: Michael Muller Concerning Brock Fredin

- **Address: N/A**

City Pages Article as described above, multiple fake sex ads published as described in the Complaint.

INTERROGATORY NO. 9: Identify all facts and documents that support the contention that Defendant commenced a baseless HRO proceeding as alleged in paragraph 8 of the Amended Complaint.

ANSWER:

- Location: Folder 13 (Interrogatory 9 folder)
- Nature of Document: PDF
- Date: January 1, 2016 to present
- Subject Matter: Police Reports
- Individual: Catherine Schaefer, Grace Miller concerning Brock Fredin
- Address: N/A

Fact: Defendants took everything from Plaintiff

Fact: Defendants took Plaintiff's home

Fact: Defendants took Plaintiff's mother from him

Fact: Defendants deprived Plaintiff of access to his dog

Fact: Defendants destroyed Plaintiff's professional career

Fact: Defendants destroyed any ability for Plaintiff to ever have a family, children, or a home

Fact: Defendants illegally falsely imprisoned Plaintiff for a year

Fact: Defendants continued to contact Plaintiff

Fact: Defendants conspired to pile-on bogus orders

Fact: Defendants contacted one another in hatching their scheme prior to initiating any HRO proceedings

Fact: Defendants published fake sex ads impersonating Plaintiff

Fact: Defendants published false defamatory content to induce Plaintiff's views

Fact: Defendants filed numerous false and misleading police reports

Fact: The Minnesota Supreme Court reversed and vacated Defendants abusive actions

Fact: Plaintiff's Match.com profile was permissive constitutional conduct and

Defendants clicked, viewed, and filed false police reports

INTERROGATORY NO. 10: Identify all addresses where you have resided from 2016 to present, indicating the dates in which you have lived at those locations.

ANSWER:

- Location: Folder 13 (Interrogatory 10 folder > 1905 iris bay)
- Nature of Document: PDF
- Date: January 1, 2017
- Subject Matter: 2017 Income Taxes
- Individual: Brock Fredin
- Address: 1905 iris Bay, Hudson, WI 54016

- Location: Folder 13 (Interrogatory 10 folder > 1905 iris bay)
- Nature of Document: PDF
- Date: April 28, 2017
- Subject Matter: Search Warrant
- Individual: Brock Fredin, David McCabe, et al
- Address: 1905 iris Bay, Hudson, WI 54016

1180 Grand Ave, Saint Paul, MN October 2015 – September/October 2016

1905 Iris Bay Hudson, WI 54016, September/October 2016 – July/August 2017.

1180 7th Ave, Baldwin, WI, July/August 2017 – Present/August 2019

- Walmart, 801 Meacham Rd, Elk Grove Village, IL 60007 (June/July 2019) (while interviewing for jobs at Mastercard and other positions.)
- Planet Fitness, N89W16899 Appleton Ave, Menomonee Falls, WI 53051 (Given Defendants action had only \$20 after gas money depleted and used it on membership to shower and sleep in parking lot off and on), August 2019 to October 1, 2019
- Walmart, Germantown, WI 190n9855 Appleton Ave, Germantown, WI 53022, August 2019 to Present (off and on while working for a

- fortune 500 company)
- Motel 6, Glendale WI, 485 N Port Washington Rd, Glendale, WI
October 1, 2019 to November 2019 (off and on while working for a
fortune 500 company)
- Motel 6 Elk Grove, IL, 2881 Touhy Ave, Elk Grove Village, IL
60007, October 4, 2019 to November 2019 (off and on while
working for a fortune 500 company and interviewing for positions at
Mastercard/etc)

November 12, 2019 – present, Redacted Phoenix, Arizona Address. The address changes per work requirements. I am terrified of these powerful women who have ruined my life and fearful they will direct either vigilante or state-sponsored physical violence on me wherever I go, or worse, destroy my professional reputation with companies in this location. I will object to any more specific address identification than what is provided to fulfill the requirement of the interrogatory and the Court's order unless it's carried out for in camera review, sealed, or redacted.

INTERROGATORY NO. 11: Identify by description and amount each item of damages

that you are claiming for each count in the Amended Complaint, set forth in detail the

complete factual basis and calculation for each item of damages, and identify all documents

that support or relate to the alleged damages.

ANSWER: Each amount to be determined at jury trial.

INTERROGATORY NO. 12: Identify each person known to you who has or claims to have

knowledge of any facts relevant to the issues in this lawsuit, stating in detail all facts each

person knows or claims to know.

ANSWER:

Lindsey Middlecamp

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Emails to Mary Ellen Heng
- Emails to Tara Patet

- Emails to David McCabe
- Conversation with Grace Miller
- Conversations with Catherine Schaefer

James Street, Patrick C. Diamond, Elizabeth Clysdale, Sophia Y. Vuelo, Adam Yang

- Presiding over various hearings, communication with other judges e.g., guthman, and each other
- Clysdale's communication with Mary Ellen Heng or Tara Patet

Mary Ellen Heng

- Communication with Lindsey Middlecamp
- April 28, 2017 raid
- April 14, 2017 HRO

Tara Patet

- Communication with Lindsey Middlecamp
- April 28, 2017 raid
- April 14, 2017 HRO
- Charging Decisions

Yamy Vang

- Communication with Lindsey Middlecamp
- Communicaiton with Sophia Y. Vuelo
- April 28, 2017 raid
- April 14, 2017 HRO
- Charging Decisions

Catherine Schaefer

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Emails to Mary Ellen Heng

- Emails to Tara Patet
- Emails to David McCabe
- Conversation with Grace Miller
- Conversation with Lindsey Middlecamp

Grace Miller

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Emails to Mary Ellen Heng
- Emails to Tara Patet
- Emails to David McCabe
- Conversation with Lindsey Middlecamp
- Conversation with Catherine Schaefer

Emma Miller

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Conversation with Lindsey Middlecamp
- Conversation with Catherine Schaefer
- Conversation with Grace Miller

Tony Webster

- April 14, 2017 HRO
- April 28, 2017 Raid
- @CardsAgstHrsmt Tweets
- Conversation with Lindsey Middlecamp
- Conversation with Catherine Schaefer
- Conversation with Grace Miller

Joshua Post Lee

- Communicaion with Catheirne Schaefer

David McCabe, Amy Boyer

- April 28, 2017 raid
- Various False Police Reports
- False Rape Claim

Jon Gould, Derek Bickle, Jeff Gaylord, Ryan Fredin (brother), Kathleen Fredin (mother), Faith Amdahl (sister), Sarah Logghe

- Non-party family and friends with knowledge of the situation.

INTERROGATORY NO. 13: Identify each person you expect to call, or you may call, as an expert witness at trial and, with respect to each person identified, set forth specifically, completely and in detail:

- a. The name, address and qualifications of the expert, including without limitation the expert's educational, academic, professional and vocational background.
- b. Identify any published articles or treatises authored by the expert witness relevant to the subject of the inquiry in this matter. Such identification should include the title of the article, the publication in which it appeared, and the date of publication.
- c. Provide the venue and case title of any other litigation in which the expert witness has been retained.
- d. State the substance of the facts to which the expert is expected to testify about and which the expert has personal knowledge.
- e. State the substance of the facts, the truth of which the expert has been or will be asked to assume.

- f. State the substance of all the opinions to which the expert is expected to testify.
- g. State in summary, the grounds for each such opinion identifying any publications upon which the expert has relied in whole or in part grounding the opinions held, any data or other information considered by the expert in forming the opinion, and any exhibits to be used as a summary of or support for the opinion.

ANSWER: Unknown

INTERROGATORY NO. 14: Identify each individual you intend to present as a witness at trial. Include in your answer the name, address and telephone number of each witness identified and a brief description of the subject matter of their anticipated testimony.

ANSWER: Unknown

INTERROGATORY NO. 15: Identify each document or exhibit in your possession which is relevant to the issues in this action, or which you may use, offer, or introduce with respect to motion practice or at the trial in the above-entitled matter.

ANSWER:

<https://www.dropbox.com/s/allxpdxu4an8ul/twitter.pdf?dl=0>

March 2016 HRO Petition

June 2016 HRO Petition

Transcripts

Published Ads

City Pages Article

CardsAgstHrsmt Tweets

Various Unsolicited Text Messages

January 2016 – present Defendants Facebook Posts

INTERROGATORY NO. 16: Identify all statements taken or received relating to the

matters/issues identified in the pleadings and for each such statement:

- a. Identify each person from whom you have taken the statement;
- b. Identify whether the statement was oral, written, by a court reporter, or video
- c. Identify each person taking the statement and any other person present during the statement

ANSWER:

This is duplicative. The documents are available throughout the discovery production. The following is a list of documents.

- Location: Folder 13 (Interrogatory 1-16 folder)
- Nature of Document: oral and written
- Date: November 17, 2019
- Subject Matter: Police Report
- Individual: Saint Paul Police / Brock Fredin
- Address: Unknown

- Location: Folder 13 (Interrogatory 1-16 folder)
- Nature of Document: oral and written
- Date: May or June 2018
- Subject Matter: Harassment Injunction
- Individual: Saint Croix County Court, Catherine Schaefer, Brock Fredin
- Address: Saint Croix County, WI

- Location: Folder 13 (Interrogatory 1-16 folder)
- Nature of Document: oral and written
- Date: January 2017 to present
- Subject Matter: All cases in Ramsey County Described herein
- Individual: Lindsey Middlecamp, Grace Miller, Catherine Schaefer
- Address: Ramsey County, MN

- Location: Folder 13 (Interrogatory 1-16 folder)
- Nature of Document: oral and written
- Date: May or June 2018
- Subject Matter: Title IX Complaint
- Individual: Penn Sate, Catherine Schaefer, Brock Fredin

- Address: Penn State, PA

Oral statements throughout 2017-2019:

David Hitch, Saint Croix County Therapist, Yvonne Eisenger, Nurse Practitioner, Park

Nicollet, Kathleen Fredin, Ryan Fredin; oral and written

Jon Gould, Jeff Gaylord, Sarah Logghe,

INTERROGATORY NO. 17: Identify any oral representations, admissions, or statements against interest allegedly made by Defendant that are relevant to the issues in this lawsuit:

- a. Identify in detail the terms of each admission and indicate the date and place of making each admission;
- b. Identify the name, occupation, title, telephone number, and the last known business and residential address of the person(s) purportedly making each admission and the person(s) purportedly present at the time each admission was made; and
- c. Identify by author, date, title, and subject matter each document that evidences or refers to each admission.

ANSWER:

This is duplicative. The documents are available throughout the discovery production. The following is a list of documents.

- Location: Folder 13 (Interrogatory 1-17 folder)
- Nature of Document: Written and Oral
- Date: January 2017 to present
- Subject Matter: Twitter (CardsAgstHrsmt)
- Individual: Linsey Middlecamp
- Address: Minneapolis
- Location: Folder 13 (Interrogatory 1-17 folder)

- Nature of Document: Written and Oral
- Date: January 2017 to present
- Subject Matter: Brock Fredin
- Individual: Joshua Post Lee, Catheirne Schaefer
- Address: Minneapolis
- Location: Folder 13 (Interrogatory 1-17 folder)
- Nature of Document: Written and Oral
- Date: January 2017 to present
- Subject Matter: Brock Fredin
- Individual: Natalie Rierison, Catheirne Schaefer
- Address: Minneapolis
- Location: Folder 13 (Interrogatory 1-17 folder)
- Nature of Document: Written and Oral
- Date: January 2017 to present
- Subject Matter: Brock Fredin
- Individual: Tiffany Dynamite Roberts, Catheirne Schaefer
- Address: Minneapolis
- Location: Folder 13 (Interrogatory 1-17 folder)
- Nature of Document: Written and Oral
- Date: January 2017 to present
- Subject Matter: Brock Fredin
- Individual: Grace Miller, Lindsey Middlecamp, Catheirne Schaefer
- Address: Minneapolis and Saint Paul
- Location: Folder 13 (Interrogatory 1-17 folder)
- Nature of Document: Written and Oral
- Date: January 2017 to present
- Subject Matter: Brock Fredin
- Individual: Lindsey Middlecamp, Mary Ellen Heng, David McCabe, Tara Petit, Laura Pietan
- Address: Minneapolis and Saint Paul

INTERROGATORY NO. 18: Identify the persons and entities from whom documents

were sought and gathered for production in response to Defendant's Request for

Production of Documents.

ANSWER:

This is duplicative. The documents are available throughout the discovery production. The following is a list of documents.

- Location: Folder 13 (All documents, Interrogatory 1-17 folder)
 - Nature of Document: Written
 - Date: January 2017 to present
 - Subject Matter: Court Filings
 - Individual: Second District Court Records
 - Address: 15 W Kellogg Blvd, Saint Paul, MN
-
- Location: Folder 13 (All documents, Interrogatory 1-17 folder)
 - Nature of Document: Written
 - Date: January 2017 to present
 - Subject Matter: Police Reports
 - Individual: Saint Paul City Data Records
 - Address: Saint Paul PD
-
- Location: Folder 13 (All documents, Interrogatory 1-17 folder)
 - Nature of Document: Written
 - Date: January 2017 to present
 - Subject Matter: Police Reports
 - Individual: Minneapolis Police Records
 - Address: Minneapolis PD
-
- Location: Folder 13 (All documents, Interrogatory 1-17 folder)
 - Nature of Document: Written
 - Date: January 2017 to present
 - Subject Matter: Twitter
 - Individual: Lindsey Middlecamp's Twitter account @CardsAgstHrsmt
 - Address: twitter.com/cardsagsthrsmt
-
- Location: Folder 13 (All documents, Interrogatory 1-17 folder)
 - Nature of Document: Written
 - Date: January 2017 to present
 - Subject Matter: Facebook
 - Individual: Grace Miller's Facebook posts
 - Address: facebook.com/grace.e.miller
-
- Location: Folder 13 (All documents, Interrogatory 1-17 folder)
 - Nature of Document: Written
 - Date: January 2017 to present
 - Subject Matter: Catherine Schaefer's Revenge Pornography
 - Individual: blackoutx2 and epicviewf12 profiles
 - Address: <https://www.collarspace.com/personals/v/2424695/details.htm>

INTERROGATORY NO. 19: Identify all persons who provided answers or assisted in providing answers to these interrogatories.

ANSWER: No known entity exists.

INTERROGATORY NO. 20: Identify the persons and entities from whom documents were sought and gathered for production in response to Defendant's Request for Production of Documents.

ANSWER: Documents were sought and gathered through Plaintiff's personal email, storage, and records. I did keyword searches through my email and folder structures on my macbooks.

Dated: September 29, 2017
Milwaukee, WI

/s/ Brock Fredin

Brock Fredin
Baldwin, WI 54016
(612) 424-5512 (tel.)
brockfredinlegal@icloud.com
Plaintiff, Pro Se

E

From: 13.82 " <13.82 >

To: "Heng, Mary Ellen" <MaryEllen.Heng@minneapolismn.gov>

Subject: your counterpart at St. Paul?

Date: Tue, 24 Jan 2017 15:44:45 +0000

Attachments: 13.82 _petitioner_Respondent_v_Brock_Fredin_Appellant.pdf

Inline-Images: image003.png

Mary Ellen,

Do you know/have contact info for your counterpart at the City of St. Paul? This is something of a professional courtesy email that, if you felt it was appropriate, I was hoping could be forwarded to their attention.

I have a friend who, in November of last year, got a restraining order against a man in St. Paul who stalked her for nearly two years even after she moved out of state all because she declined to meet him after brief contact on a dating site. He has retaliated against the restraining order in several dramatic ways; after storming out of the hearing at which it was granted, he promptly registered and launched a website referring to her by full name as a stalker and sexual predator and linking to her contact

13.82

Yesterday, the Court of Appeals issued an opinion in a different matter brought by a different woman () against the same man. I'm attaching it here. I can tell you that I've spoken with several of his former colleagues or acquaintances and this seems like a very troubled individual with a documented history of serial harassment and escalation. He has been kicked out of a local gym for concerning threatening behavior towards a trainer, has been blacklisted from certain community groups for his alarming online conduct, etc. I have serious concerns that if he is not held accountable for violations of this restraining order, he will escalate either in his aggression against my acquaintance, or in parallel tracks against other women.

The "professional courtesy" angle here is that I'm also aware my friend is being contacted by journalists with MPR and City Pages about her experiences with this man and other women's restraining orders and issues with him. I believe it is likely the narrative will take a position that "St. Paul is doing nothing to protect them" in light of the cops basically telling her her main recourse was stop googling her own name and try to move on with her life despite his persistent attempts to sabotage and harass her. I thought it was worth at least forwarding the Court of Appeals decision to the potential prosecutors to see if the pattern/trend of this man's troubling behavior causes them to have more confidence in the need to pursue him in 13.82 case. I know resources and other considerations dictate case load but sometimes having another lawyer confirm this isn't a total goose chase seems helpful in giving things another look.

13.82

Minneapolis
City of Lakes

From: [REDACTED] 13.82
[REDACTED] 13.82

To: "tara.patet@ci.stpaul.mn.us" <tara.patet@ci.stpaul.mn.us>

Subject: RE: your counterpart at St. Paul?

Date: Tue, 24 Jan 2017 18:41:54 -0000

Inline-Images: image004.png; image001.png

Tara,

Thank you so much for such a prompt reply and I understand the challenges and frustrations with perps who are strategic in their contact.

13.82

Anyway—I just wanted to be a conduit for that [REDACTED] 13.82 decision to make it to your office and make sure the recent contact gets considered. I do think she'll take comfort knowing that the investigator and your office have a consistent set of eyes on this guy.

13.82



From: Patet, Tara (CI-StPaul) [<mailto:tara.patet@ci.stpaul.mn.us>]
Sent: Tuesday, January 24, 2017 10:15 AM
To: Heng, Mary Ellen
Cc: McCabe, David (CI-StPaul)
Subject: RE: your counterpart at St. Paul?

I am familiar with this case, as are a couple other prosecutors in my office. As much as we want to get this guy, and as much as it is clear that he's intentionally trying to "get around" the HRO, we just haven't had a prosecutable case presented to us yet. What we have done, in partnership with SPPD Family Violence unit, is to have a single investigator appointed to the case(s) so that all are coming to one person and so that each time new behavior gets reported, the reviewing investigator and prosecutor are able to immediately see it in context with the larger body of conduct. I will forward your email on to the investigator as an FYI as well.

Thanks again, and have a great Tuesday.

From: Heng, Mary Ellen [<mailto:MaryEllen.Heng@minneapolismn.gov>]
Sent: Tuesday, January 24, 2017 10:06 AM
To: Patet, Tara (CI-StPaul)
Subject: FW: your counterpart at St. Paul?

Tara –

I am forwarding you this email from a colleague of mine who works in our civil division. She is friends with victim [REDACTED] 13.82 I believe you reviewed a case involving [REDACTED] 13.82 and Brock Fredin. [REDACTED] 13.82 asked me to forward on her email and this case to you.

From: [REDACTED] 13.82
Sent: Tuesday, January 24, 2017 9:45 AM
To: Heng, Mary Ellen
Subject: your counterpart at St. Paul?

Mary Ellen,

Do you know/have contact info for your counterpart at the City of St. Paul? This is something of a professional courtesy email that, if you felt it was appropriate, I was hoping could be forwarded to their attention.

I have a friend who, in November of last year, got a restraining order against a man in St. Paul who stalked her for nearly two years even after she moved out of state all because she declined to meet him after brief contact on a dating site. He has retaliated against the restraining order in several dramatic ways; after storming out of the hearing at which it was granted, he promptly registered and launched a website referring to her by full name as a stalker and sexual predator and linking to her contact

13.82

F

From: "McCabe, David (CI-StPaul)" <david.mccabe@ci.stpaul.mn.us>

To: [REDACTED] 13.43

Subject: Brock Fredin

Date: Tue, 24 Jan 2017 16:32:49 +0000

Inline-Images: image001.jpg

13.43

I saw your email to Mary Heng, then to Tara Patet. I have been working on this case for several years now and so far everything I have submitted has been declined.



Sergeant David McCabe
Sex Crimes Unit

Saint Paul Police Department
367 Grove Street
Saint Paul, MN 55101
Phone 651-266-5702
Fax 651-266-5529
david.mccabe@ci.stpaul.mn.us

From: "Patet, Tara (CI-StPaul)" <tara.patet@ci.stpaul.mn.us>

To: "Heng, Mary Ellen" <MaryEllen.Heng@minneapolismn.gov>

Subject: RE: your counterpart at St. Paul?

Date: Tue, 24 Jan 2017 16:17:06 +0000

Inline-Images: image001.png

Certainly.

From: Heng, Mary Ellen [mailto:MaryEllen.Heng@minneapolismn.gov]

Sent: Tuesday, January 24, 2017 10:16 AM

To: Patet, Tara (CI-StPaul)

Subject: RE: your counterpart at St. Paul?

Thank you. Can I let [REDACTED] know this information?

From: Patet, Tara (CI-StPaul) [mailto:tara.patet@ci.stpaul.mn.us]

Sent: Tuesday, January 24, 2017 10:15 AM

To: Heng, Mary Ellen

Cc: McCabe, David (CI-StPaul)

Subject: RE: your counterpart at St. Paul?

I am familiar with this case, as are a couple other prosecutors in my office. As much as we want to get this guy, and as much as it is clear that he's intentionally trying to "get around" the HRO, we just haven't had a prosecutable case presented to us yet. What we have done, in partnership with SPPD Family Violence unit, is to have a single investigator appointed to the case(s) so that all are coming to one person and so that each time new behavior gets reported, the reviewing investigator and prosecutor are able to immediately see it in context with the larger body of conduct. I will forward your email on to the investigator as an FYI as well.

Thanks again, and have a great Tuesday.

From: Heng, Mary Ellen [mailto:MaryEllen.Heng@minneapolismn.gov]

Sent: Tuesday, January 24, 2017 10:06 AM

To: Patet, Tara (CI-StPaul)

Subject: FW: your counterpart at St. Paul?

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13.82

Yesterday, the Court of Appeals issued an opinion in a different matter brought by a different woman [REDACTED] 13.82 against the same man. I'm attaching it here. I can tell you that I've spoken with several of his former colleagues or acquaintances and this seems like a very troubled individual with a documented history of serial harassment and escalation. He has been kicked out of a local gym for concerning threatening behavior towards a trainer, has been blacklisted from certain community groups for his alarming online conduct, etc. I have serious concerns that if he is not held accountable for violations of this restraining order, he will escalate either in his aggression against my acquaintance, or in parallel tracks against other women.

The "professional courtesy" angle here is that I'm also aware my friend is being contacted by journalists with MPR and City Pages about her experiences with this man and other women's restraining orders and issues with him. I believe it is likely the narrative will take a position that "St. Paul is doing nothing to protect them" in light of the cops basically telling her her main recourse was stop googling her own name and try to move on with her life despite his persistent attempts to sabotage and harass her. I thought it was worth at least forwarding the Court of Appeals decision to the potential prosecutors to see if the pattern/trend of this man's troubling behavior causes them to have more confidence in the need to pursue him in [REDACTED] case. I know resources and other considerations dictate case load but sometimes having another lawyer confirm this isn't a total goose chase seems helpful in giving things another look.

13.82

13.82

From: "McCabe, David (CI-StPaul)" <david.mccabe@ci.stpaul.mn.us>

To: [REDACTED] 13.43

Subject: Brock Fredin

Date: Tue, 24 Jan 2017 16:32:49 +0000

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Fax 651-266-5529
david.mccabe@ci.stpaul.mn.us

From: "Heng, Mary Ellen" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8FB9455EF86C4CADB15A86AA817EC7B8-HENG, MARY>

To: [REDACTED] 13.82

Subject: FW: your counterpart at St. Paul?

Date: Tue, 24 Jan 2017 16:36:22 -0000

Inline-Images: image001.png

13.82 I sent this to Tara Patet who is a supervisor over in the St. Paul City Attorney's Office. She did review the case and here is her response.

From: Patet, Tara (CI-StPaul) [mailto:tara.patet@ci.stpaul.mn.us]
Sent: Tuesday, January 24, 2017 10:15 AM
To: Heng, Mary Ellen
Cc: McCabe, David (CI-StPaul)
Subject: RE: your counterpart at St. Paul?

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13.82

From: "Pietan, Laura (CI-StPaul)" <laura.pietan@ci.stpaul.mn.us>

To: "Heng, Mary Ellen (MaryEllen.Heng@minneapolismn.gov)" <MaryEllen.Heng@minneapolismn.gov>

Subject: quick question

Date: Thu, 14 Dec 2017 16:52:45 +0000

Hi Mary Ellen,

I'd like to reach out to Bloomington Criminal Deputy to see if she/he would consider reviewing a case involving Brock Fredin and one of our employees. I'd ask you - but I understand your office has ties to this defendant as well. I went to Blooming CA website, but can't locate info on Deputy - can you hook me up?

Thanks much,
Laura

Laura Pietan
Deputy St. Paul City Attorney

From: "Heng, Mary Ellen" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8FB9455EF86C4CADB15A86AA817EC7B8-HENG, MARY>
To: "Pietan, Laura (CI-StPaul)" <laura.pietan@ci.stpaul.mn.us>
Subject: RE: quick question
Date: Thu, 14 Dec 2017 16:56:09 -0000

They have a new deputy and I don't have her email. But I always contact their senior attorney Erica Glassberg. Her email is eglassberg@bloomingtonmn.gov

13.43

Mary Ellen Heng
Deputy City Attorney - Criminal

City of Minneapolis – Minneapolis City Attorney's Office
350 S. Fifth St. – Room #210
Minneapolis, MN 55415

Office: 612-673-2270
Cell: 612-708-6674
Maryellen.heng@minneapolismn.gov

From: Pietan, Laura (CI-StPaul) [mailto:laura.pietan@ci.stpaul.mn.us]
Sent: Thursday, December 14, 2017 10:53 AM
To: Heng, Mary Ellen
Subject: quick question

Hi Mary Ellen,

I'd like to reach out to Bloomington Criminal Deputy to see if she/he would consider reviewing a case involving Brock Fredin and one of our employees. I'd ask you – but I understand your office has ties to this defendant as well. I went to Blooming CA website, but can't locate info on Deputy – can you hook me up?

Thanks much,
Laura

Laura Pietan
Deputy St. Paul City Attorney

From: "mayer.peter@dorsey.com" <mayer.peter@dorsey.com>

To: "Green, David" <david.green@minneapolismn.gov>

Subject: Affidavit to Show CauseCS edit.doc

Date: Thu, 14 Dec 2017 17:04:04 +0000

Attachments: Minn. Stat. sec. 299C.46

G

MESSERLI & KRAMER

ATTORNEYS AT LAW
1400 Fifth Street Towers
100 South Fifth Street
Minneapolis, MN 55402-1217

phone 612.672.3000
fax 612.672.3777
messerlikramer.com

Additional offices in:
St. Paul & Plymouth, MN

612.672.3639
mboulette@messerlikramer.com

October 16, 2017

Via email

Brock Fredin
1905 Iris Bay
Hudson, WI 54016

Re: In Re the Matter of Lindsey Middlecamp vs. Brock Fredin
Court File No. 62-HR-CV-17-233

Dear Mr. Fredin:

I write in reply to your letter of October 11, 2017. Consistent with your request, attached please find the documents provided by Domains By Proxy, LLC in response to Ms. Middlecamp's subpoena.

Please note these documents have been provided as a courtesy. The record is closed and the discovery process ended. We will not be responding to any further discovery requests in the above matter.

Thank you.

Sincerely,



Michael P. Boulette

Enclosure

cc: Lindsey Middlecamp

Domain Information for Shopper ID 153011100

Shopper ID: 153011100
Domain Name: LINDSEYMIDDLECAMP.COM
Registrar: GoDaddy.com, LLC
Status: Active
Name Servers:
Auto Renew:
Renew Period:

Registrant Contact

Name: ragnu grivae
Company: ragnu
Email: ragnu92@gmail.com
Address 1: 823 grivery
Address 2:
City: new york city
State/Province: New York
Postal Code: 10001
Country: United States
Phone: +1.2124524782
Fax:
Modify Time: 5/8/2017 11:33:02 AM

Technical Contact

Name: ragnu grivae
Company: ragnu
Email: ragnu92@gmail.com
Address 1: 823 grivery
Address 2:
City: new york city
State/Province: New York
Postal Code: 10001
Country: United States
Phone: +1.2124524782
Fax:
Modify Time: 5/8/2017 11:33:02 AM

Administrative Contact

Name: ragnu grivae
Company: ragnu
Email: ragnu92@gmail.com
Address 1: 823 grivery
Address 2:
City: new york city
State/Province: New York
Postal Code: 10001
Country: United States
Phone: +1.2124524782
Fax:
Modify Time: 5/8/2017 11:33:02 AM

Billing Contact

Name: ragnu grivae
Company: ragnu
Email: ragnu92@gmail.com
Address 1: 823 grivery
Address 2:
City: new york city
State/Province: New York
Postal Code: 10001
Country: United States
Phone: +1.2124524782
Fax:
Modify Time: 5/8/2017 11:33:02 AM

H



Brock F <brockf12@gmail.com>

DR18_001303

2 messages

Open City <OpenCity@minneapolismn.gov>
Reply-To: Open City <OpenCity@minneapolismn.gov>
To: brockf12@gmail.com
Cc: ResponsibleAuthority@minneapolismn.gov

Mon, Oct 28, 2019 at 12:16 PM

Good afternoon,

Below is a link to a City of Minneapolis Sharepoint site that contains data responsive to your request – DR18-1303.

https://minneapolismn.gov.sharepoint.com/:f:/t/s00092/EtmNHwWyEaVJqUppyVelotYBSE_A8BMIIISBesyo_CWrFw?e=aQtY5M

Redactions were made per Minnesota Statute Ch. 13.43, 13.82, and 13.93.

To obtain your data, please follow these instructions:

1. Click on the link above.
2. Click on the "Send Code" button. The page will change to say "Enter Verification Code".
3. Check your email for an 8 digit code.
 - a. NOTE: This email may have been sent to your "Junk" folder.
4. Go back to the Sharepoint website and enter the code.
5. Download the data you requested.

If you sign up for the City of Minneapolis online portal, data can be release directly to you via the portal. To sign up, please visit: <https://minneapolis.service-now.com/opencityportal>

If you have any questions, please do not hesitate to let us know.

At this time your request will be closed.

Thanks,

Jacob Crawford

Records Management Specialist - Data Practices

City of Minneapolis – City Clerk
350 S. Fifth St. – Room #304
Minneapolis, MN 55415

Office: 612-673-2476
Jacob.Crawford@minneapolismn.gov

Ref:MSG2251890

Brock F <brockf12@gmail.com>
Draft To: Open City <OpenCity@minneapolismn.gov>
Cc: ResponsibleAuthority@minneapolismn.gov

Mon, Oct 28, 2019 at 3:08 PM

Please explain to me why this information was not provided previously. I

[Quoted text hidden]